

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
BROEGE, NEUMANN, FISCHER & SHAVER, LLC
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George Sarios and Cindy Sarios

In Re:

GEORGE SARIOS AND CINDY SARIOS,

Debtors.

Case No.: 22-12916/MBK

Chapter 11

Judge: Michael B. Kaplan

GEORGE SARIOS AND CINDY SARIOS,

Plaintiffs,

v.

THALIA SARIOS, ELLYNN WETTER and RYAN
WETTER,

Defendants.

Adv. Pro. No. 22-1109

MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that the undersigned attorneys for the Plaintiffs in the within adversary proceeding will move before the Honorable Michael B. Kaplan, United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey for an order granting summary judgment and determining that the Plaintiff enforcing the section 363 (h) of the Bankruptcy Code by: (a) entry of a judgment divesting title in the prospective purchasers of the Redwood Avenue Property; (b) expressly authorizing and empowering Plaintiffs to sign the deed, affidavit of title, and all ancillary documents on behalf of Defendants and that decreeing that such signatures will

be as legally binding and have the same force and effect as if signed by the Defendants, and (c) Defendants must vacate the premises not later than September 30, 2022.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying Memorandum of Law in support of said motion.

Broege, Neumann, Fischer & Shaver, LLC
Attorneys for the Debtors-in-Possession/Plaintiffs
George Sarios and Cindy Sarios

Dated: April 25, 2022

By: /s/ Geoffrey P. Neumann
GEOFFREY P. NEUMANN